

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:	:	
	:	Case No.: 19-10921
Anita B. Brown,	:	Chapter 13
Debtor.	:	Judge Patricia M. Mayer
	:	*****
Anita B. Brown,	:	
Movant,	:	Related to Document No.128
v.	:	
	:	
Wells Fargo Bank N.A., d/b/a Wells	:	
Fargo Auto,	:	
Kenneth E. West,	:	
Respondents.	:	

RESPONSE TO MOTION FOR ORDER TO SHOW CAUSE (DOCKET # 128)

Now comes Wells Fargo Bank N.A., d/b/a Wells Fargo Auto (“Creditor”), by and through its attorneys, Manley Deas Kochalski LLC, and responds to the Motion for Order to Show Cause filed by Anita B. Brown (“Debtor”), on June 3, 2024 at Docket # 128 (the “Motion”).

1. Denied. Paragraph 1 of the Motion refers to a document that speaks for itself requiring no response and any characterization thereof is denied.
2. Denied. Paragraph 2 of the Motion contains a legal conclusion, therefore, no response is required.
3. Denied. Paragraph 3 of the Motion contains a legal conclusion, therefore, no response is required.
4. Denied. Paragraph 4 the Motion contains a legal conclusion, therefore, no response is required. By way of further response and without waiver of the forgoing, Creditor reserves the right to further supplement these responses once undersigned counsel has

had the opportunity to confer further with Creditor, having just been retained today,
June 21, 2024.

WHEREFORE, Creditor respectfully requests that a hearing be set on the Motion and
that the Motion be denied.

Respectfully submitted,

/s/Alyk L. Oflazian

Alyk L. Oflazian, Esquire (312912)

Adam B. Hall (323867)

Manley Deas Kochalski LLC

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Attorneys for Creditor

The case attorney for this file is Alyk L.
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Kenneth E. West,	:	
Respondents.	:	

CERTIFICATE OF SERVICE

I certify that on the date of filing, a copy of the foregoing Response to Motion for Order to Show Cause was filed electronically. Notice of this filing will be sent to the following parties through the Court's Electronic Case Filing System:

Office of U.S. Trustee, Party of Interest, (Registered address)@usdoj.gov

Kenneth E. West, Chapter 13 Trustee, ecfemails@ph13trustee.com

Michael I. Assad, Attorney for Anita B. Brown, mail@cibiklaw.com

Michael A. Cibik, Attorney for Anita B. Brown, help@cibiklaw.com

I certify that on the date of filing, a copy of the foregoing document was sent by U.S. Mail to the following:

Anita B. Brown, 1922 W. Spencer Street, Philadelphia, PA 19141

/s/Alyk L. Oflazian